and data from a read-only memory and/or a random access memory. Generally, a computer will include one or more mass storage devices for storing data files; such devices include magnetic disks, such as internal hard disks and removable disks; magneto-optical disks; and optical disks. Storage devices suitable for tangibly embodying computer program instructions and data include all forms of non-volatile memory, including by way of example semiconductor memory devices, such as EPROM, EEPROM, and flash memory devices; magnetic disks such as internal hard disks and removable disks; magneto-optical disks; and CD-ROM disks. Any of the foregoing can be supplemented by, or incorporated in, ASICs (application-specific integrated circuits).

To provide for interaction with a user, the invention can be implemented on a computer system having a display device such as a monitor or LCD screen for displaying information to the user and a keyboard and a pointing device such as a mouse or a trackball by which the user can provide input to the computer system. The computer system can be programmed to provide a graphical user interface through which computer programs interact with users.

A number of implementations of the invention have been described. Nevertheless, it will be understood that various modifications can be made without departing from the spirit and scope of the invention.

For example, in the above specification playbacks related to a maximum playback count or to a time limitation (relative or absolute) were described. However, playback limitations can depend on other factors as well, such as the presence or absence of other audio files. For example, a user can have to download two extra promotional audio files in order to get the audio file that he or she really wants.

The CRM functions can be distributed in various ways between the communication module and the content server. An intelligent communication module can be implemented to handle commands that are more complex, and to be more similar to a download manager in that it does not require much support from the server, while a non-intelligent communication module can be implemented to contain only the basic functions and to require that more tasks be performed by the server.

A web server is not the only type of user interface that can be used by a system in which the invention can be implemented. Any means of communication with a remote

device would work, and any means of communication will work as well. The invention is not dependent on the type of connection with the device or user as long as data can be transferred from one place to another.

For closed system devices without complete operating systems, an area of non-volatile memory that can only be read or written to by the device firmware can be a secure storage area. On open devices with more functional operating systems, such as personal computers, an alternate method of establishing a secure area must be used. An example of such an alternate method is the creation of an encrypted file that can only be read by a tamper resistant software application or module.

The invention has been described above for audio files in particular, but is also applicable to other types of media files, such as video files, and corresponding media playback devices for playing back files of this type.

Accordingly, other embodiments are within the scope of the following claims.

What is claimed is: